

1 J. Napor - by Mr. Sieminski  
2 were entitled to it. I think he in good  
3 conscience was looking to confirm what did he  
4 owe, and I think he was also looking for some  
5 reason why he didn't have to pay it, so I just  
6 made it available to him.

7 As I recall, he and his attorney  
8 were out there, the attorney was with him a day  
9 and a half or two days. John was there another  
10 day on his own and then he expected to stay  
11 there until he completed this, but then he said  
12 he had to go back to California for something  
13 and he would be back in a couple weeks and left  
14 all the stuff out.

15 That got delayed a couple times and  
16 I think his attorney came out one day. As I  
17 recall, I think it was the attorney was going  
18 to copy something, John may have, I don't  
19 remember, but again they were all things that  
20 could be manufactured. We knew what they were.  
21 There is no magic about these numbers and  
22 invoices and statements.

23 Over the time, and we haven't been a  
24 fully functional business, it is a 200,000 foot  
25 building with a lot of stuff in it and I have a

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2 handful of employees, we are liquidating  
3 equipment, consolidating accounts, cleaning up  
4 space so we can liquidate, and somewhere along  
5 the line we have lost track of some of the  
6 paperwork because I remember it being much more  
7 voluminous than we have now, but I also don't  
8 think there was anything in there that is  
9 germane. I think we have all the important  
10 stuff here.

11 Q. I honestly don't want to make this  
12 into an exercise of looking through documents  
13 for extended periods of time this afternoon --

14 A. I really appreciate that. Thank  
15 you, sir.

16 Q. -- but is there any document that  
17 you can put your hands on quickly here this  
18 afternoon that would indicate that as of  
19 August 31, 1998 Plaza owed a total of \$685,379?

20 A. How about this one that actually  
21 shows that as of that date this \$720,679?

22 MR. REILLY: What you are  
23 referring to is an account statement of  
24 August 31, 1998; is that right?

25 A. I think what happened is we picked